

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**ALVA JOHNSON,**

*Individually and On Behalf of All Others  
Similarly Situated*

**Case No. 8:19-cv-475-T-02SPF**

**Plaintiff,**

**vs.**

**DONALD J. TRUMP**

*In his Individual Capacity and*

**DONALD J. TRUMP FOR PRESIDENT,  
INC.,**

**Defendant,**

\_\_\_\_\_/

**DECLARATION OF OMAROSA MANIGAULT NEWMAN**

I, Omarosa Manigault Newman, hereby declare as follows:

1. I make this Declaration based upon personal knowledge and/or upon information and belief.
2. I am over 21 years of age and fully competent to make this declaration. I live in Florida. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.

**My Job Duties at Donald J. Trump for President, Inc.**

3. I was employed at Donald J. Trump for President, Inc. from 2015 until 2016.
4. My job title was Director of African American Outreach. My job duties included advising the Campaign regarding African American outreach, conducting outreach via media and events for African American and women's coalitions, speaking at Republican Party events, and preparing communications to be distributed to the media.

**Common Compensation Policies and Centralized Decision-Making  
at Donald J. Trump for President, Inc.**

5. All employees of Donald J. Trump for President, Inc. throughout the country were subjected to the same common and uniform compensation policies and practices. Such policies governed all components of my pay, including initial salary, salary increases, promotional salary increases, bonuses, awards, and incentive pay.

**Unequal Pay for Women at Donald J. Trump for President, Inc.**

6. I believe that Donald J. Trump for President, Inc. paid me and other similarly situated female employees less than male employees who performed the same or similar job duties under similar working conditions.
7. For example, Bryan Lanza, whose work required substantially equal skill, effort, and responsibility as mine was paid more than me despite being similarly situated.

I declare under penalties of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated:

Location:

Respectfully submitted,



Omarosa Manigault Newman